

EXHIBIT C

To Defendants Shell Oil Company and Shell Oil Products
US, Inc.'s Joinder in Defendant United States Steel's
Motion to Exclude Plaintiff's Expert Robert Herrick

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

- - -

JAMES COPPAGE :
Plaintiff, : Civil Action
vs. : No.
: 1-18-cv-03823-
UNITED STATES STEEL : GLR
CORPORATION, et al., :
:
Defendants. :

- - -

March 11, 2019

- - -

Videotaped Deposition of JAMES
COPPAGE, taken pursuant to Notice at the
Sheraton-Baltimore North Hotel, 903 Dulaney
Valley Road, Towson, Maryland 21204,
beginning at 9:05 a.m. before Brigitte A.
Strain, a Federally Approved Registered
Professional Reporter and Notary Public in
and for the State of Maryland.

- - -

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1 VIDEO TECHNICIAN: Good

2 morning. We are going on the record

3 at 9:05 a.m. on March 11, 2019.

4 This is media unit one of the

5 video recorded deposition of James

6 Coppage, taken by counsel for the

7 Plaintiff in the matter of James

8 Coppage versus United States Steel

9 Corporation, et al., filed in the

10 United States District Court for the

11 District of Maryland. Case Number

12 1:18-cv-03823-GLR.

13 This deposition is being held

14 at Sheraton Baltimore North Hotel,

15 located at 903 Dulany Valley Road,

16 Towson, Maryland 21204.

17 My name is Curtis Rosinski,

18 and I'm the videographer. The court

19 reporter is Brigitte Strain.

20 Would counsel please identify

21 yourselves and state whom you

22 represent.

23 MR. DuPONT: Andrew DuPont for

24 Mr. Coppage.

1 MS. MAGLIOCCA: Erica

2 Magliocca for Sun Chemical and

3 Rycoline.

4 MR. LeCLERE: Kyle LeClere for

5 Flint CPS Inks North America, LLC.

6 MR. FITZPATRICK: Brendan

7 Fitzpatrick for EMCO Chemical

8 Distributors, Inc.

9 MR. RICHMOND: Scott Richmond

10 on behalf of Varn International.

11 MR. FISHKIN: Andy Fishkin for

12 Ashland LLC and Union Oil Company of

13 California.

14 MR. SCHUMAN: Ed Schuman for

15 BASF Corporation.

16 MR. PELES: Joshua Peles on

17 behalf of Shell Oil Company and Shell

18 Oil Products US.

19 MR. WEISS: Eric Weiss for

20 Fujifilm Hunt Chemicals USA, Inc.

21 MR. PERRELLI: Adam Perrelli

22 on behalf of T.H. Agriculture and

23 Nutrition and Harcros Chemicals.

24 MS. PROSSER: Deborah Prosser

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<p style="text-align: right;">Page 82</p> <p>1 days.</p> <p>2 Q. How about as a journeyman</p> <p>3 pressman at the Wall Street Journal and</p> <p>4 Baltimore Sun, in that period of '98 until</p> <p>5 2006, when you retired, how many days a week</p> <p>6 were you working?</p> <p>7 A. Average five, but I could get</p> <p>8 six sometimes. You know, not too often.</p> <p>9 Q. Before you started working at</p> <p>10 the press shops in 1960 -- Excuse me.</p> <p>11 MR. DuPONT: Strike that.</p> <p>12 BY MR. DuPONT:</p> <p>13 Q. Before you started working at</p> <p>14 the Baltimore Sun in 1960, had you had jobs</p> <p>15 before that?</p> <p>16 A. Yes.</p> <p>17 Q. And what type of work did you</p> <p>18 do before that?</p> <p>19 A. Worked for two plumbing</p> <p>20 outfits. Worked three gas stations.</p> <p>21 Q. How much time did you spend at</p> <p>22 the gas stations?</p> <p>23 A. 40 hour week.</p> <p>24 Q. For how long a period of time?</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Now I know that.</p> <p>2 Q. What do you understand it to</p> <p>3 be? I know it's a big word, so do your best</p> <p>4 with it.</p> <p>5 A. Myelodysplastic syndrome. I</p> <p>6 had a doctor write it down.</p> <p>7 Q. You can hold on to that for</p> <p>8 now.</p> <p>9 A. Oh, I thought they'd want the</p> <p>10 spelling.</p> <p>11 Q. What happened with your health</p> <p>12 in 2012?</p> <p>13 A. 2012, I went to my primary</p> <p>14 care physician for a regular checkup. And</p> <p>15 we did blood work. And my white cell count</p> <p>16 was at 19,000. So he sent me to a Dr.</p> <p>17 Schraeder at St. Joseph's Hospital. And we</p> <p>18 talked about the situation, you know. And</p> <p>19 at the time he told me that the only thing</p> <p>20 we do right now -- and we only discussed</p> <p>21 white cells. We didn't discuss any other</p> <p>22 cells. He says, we just monitor it. We</p> <p>23 don't do anything till you get over 50.</p> <p>24 50,000.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Not too long. About 17 -- Oh,</p> <p>2 wow. Between -- between the four that I</p> <p>3 just said, the four -- less than two years.</p> <p>4 Q. Were there three gas stations</p> <p>5 or four?</p> <p>6 A. Three.</p> <p>7 Q. Okay. So --</p> <p>8 A. One, two, three.</p> <p>9 Q. So combined time, less than</p> <p>10 two years between those gas stations,</p> <p>11 whether it was three or four?</p> <p>12 A. And the two plumbers.</p> <p>13 Q. Okay. So the two years --</p> <p>14 during those two years you spent working at</p> <p>15 the two plumbers and three or four gas</p> <p>16 stations?</p> <p>17 A. Right.</p> <p>18 Q. So I want to change gears with</p> <p>19 you and I want to talk to you about your</p> <p>20 health. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. Do you have a form of cancer?</p> <p>23 A. Yes.</p> <p>24 Q. All right. What do you --</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. 50,000 what?</p> <p>2 A. Cells, I guess.</p> <p>3 Q. White blood cells?</p> <p>4 A. Oh, white blood cells, yes.</p> <p>5 Q. All right. So this is in</p> <p>6 2012?</p> <p>7 A. 2012.</p> <p>8 Q. So we're going to pick up with</p> <p>9 that in a minute, but I want to talk to you</p> <p>10 about your health before 2012.</p> <p>11 Did you have some -- How were</p> <p>12 you feeling before you learned about these</p> <p>13 white blood cells being elevated in 2012?</p> <p>14 A. Fine.</p> <p>15 Q. And how was it that you</p> <p>16 learned about the white blood cells being</p> <p>17 high?</p> <p>18 A. Through a blood test for --</p> <p>19 What do you call it? Just for a regular</p> <p>20 checkup.</p> <p>21 Q. Now, before you had this blood</p> <p>22 test and you were found to have around</p> <p>23 19,000 white blood cells, did you -- you</p> <p>24 said you were feeling fine?</p>

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<p style="text-align: right;">Page 278</p> <p>1 A. No. The doctor just said he's 2 worn out. 3 Q. Now, when your parents smoked 4 growing up, and I know this was a long time 5 ago, this was a different time, but would 6 they have smoked in your house? 7 A. No. Oh, yes. 8 Q. In the car, if they were 9 driving you around? 10 A. Yes. 11 Q. Okay. Pretty much wherever. 12 Right? 13 A. Yes. 14 Q. Okay. Sir, did you do it -- 15 other than speaking with your attorney -- 16 and I don't want to know about any 17 discussions with your attorneys, but did you 18 do anything else to prepare for your 19 deposition here today? 20 A. Just made my little list up 21 for a timeline. 22 Q. Okay. And those are the notes 23 that we already talked about; correct? 24 A. Yes.</p>	<p style="text-align: right;">Page 280</p> <p>1 page, and towards the bottom of the page, 2 there's listed a Shell gas station. 3 A. Yes. 4 Q. Do you recall working at this 5 -- or at the Don & Jess Shell Station in 6 1960? 7 A. Yes. 8 Q. And what did you do when you 9 worked at this station? 10 A. Pumped gas, grease cars, fix 11 flats. 12 Q. And -- 13 A. I wasn't a mechanic. 14 Q. How frequently did you work at 15 this gas station? 16 A. Five days a week. 17 Q. Five days a week. And do you 18 recall what your rate of pay was during that 19 period? 20 A. Minimal. Probably minimum 21 wage. 22 Q. Okay. And did you work for 23 the entire year? 24 A. 1960? No.</p>
<p style="text-align: right;">Page 279</p> <p>1 Q. So did you review any other 2 documents? 3 A. No, other than -- the real 4 timeline was when I got this. That's when I 5 -- that's where I could start making my 6 timeline. 7 Q. And you're referring to that 8 that -- the Walgreens pamphlet; is that 9 correct? 10 A. Yes. 11 Q. Okay. Those are all the 12 questions I have, sir. 13 - - - 14 BY MR. PELES: 15 Q. Good afternoon, Mr. Coppage. 16 My name is -- 17 A. Good afternoon. 18 Q. -- Josh Peles. I represent 19 Shell Oil Company, Shell Oil Products US. I 20 just have a few questions for you. 21 On your Social Security 22 Statement, and that's this -- 23 A. Oh, this here. 24 Q. -- one over here, on the first</p>	<p style="text-align: right;">Page 281</p> <p>1 Q. And do you recall the months 2 in which you worked at this Shell gas 3 station? 4 A. Warm weather, maybe summer 5 time. 6 Q. Okay. That's all I have. 7 Thank you. 8 A. Okay. Thank you. 9 MS. PROSSER: I forgot. May I? 10 MR. DuPONT: Have all the 11 other defendants gone yet? 12 MS. PROSSER: Oh, I'm sorry. 13 Anybody -- anybody has -- 14 MR. DuPONT: Any other defense 15 counsel, anybody on the phone? 16 Anybody have questions? 17 (No response.) 18 MR. DuPONT: Okay. I have some 19 questions. 20 MS. PROSSER: Can I just do a 21 couple follow-ups? 22 MR. DuPONT: I'm going to go. 23 MS. PROSSER: Okay. All 24 right.</p>